



June 5, 2008

Pam Burmich
Air Resources Board
Climate Change Reporting Section
1001 I Street, Box 2815
Sacramento, CA 95812
(916) 323-8475

RE: Comments on proposed regulation for the mandatory reporting of greenhouse gas emissions.

Calpine appreciates this opportunity to comment on the "Regulation for the Mandatory Reporting of Green House Gas Emissions". Calpine Corporation is a major North American power company delivering clean, reliable and fuel-efficient power to its customers in 18 U.S. States. Calpine owns and operates 22 gas-fired power plants with electrical output greater than 20 MW and 19 geothermal power plants in the state of California, and additionally operates as an Energy Service Provider (ESP) in the state which would be affected. Calpine supports the approach that CARB has taken in these regulations and only has some minor comments to ease implementation at our facilities and make the reporting more consistent with existing reporting requirements.

Calpine appreciates the changes that ARB has made to the geothermal reporting procedure and only has one clarification.

- 95111 (i) (2) Calculation of Fugitive CO₂ Emissions from Geothermal Generating Facilities

95111 (i) (2):

Calpine has some concerns over the language that indicates that the testing need to be conducted under the supervision of agency staff. This can be interpreted differently and may imply that direct supervision is necessary for the testing. In addition, the testing conducted that yields the source specific CO₂ emissions factors is conducted in conjunction with the testing required by the local agencies for H₂S monitoring. Since the local air districts are already regulating and monitoring this testing, they would be best suited to approve the CO₂ testing as well.

(2) Operators of geothermal generating facilities may elect to calculate CO₂ emissions using ~~ARB~~ approved source specific emission factors derived from tests conducted at least annually. **The test plan shall be approved by** ~~under the supervision of ARB, or~~ the local air pollution control district or air quality management district. Upon approval

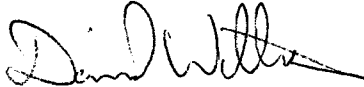
CALPINE CORPORATION

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of the test plan ~~by ARB~~, the test procedures in the plan shall be repeated in future years to update the source specific emission factors annually. In the absence of source specific emission factors ~~approved by ARB~~, the operator shall use the method specified above in section 95111(i)(1).

Thank you for the opportunity to comment and participate in this public process. The staff of the Air Resources Board has done a great job of soliciting comments and responding to stakeholders. If you have any questions or require more information, please contact me at 925-570-0849.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara McBride", with a long horizontal flourish extending to the right.

for Barbara McBride
Director, Environmental, Health and Safety
Calpine Corporation